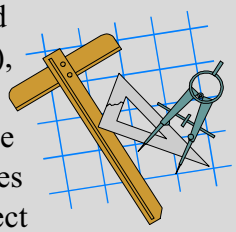
EASTERN DIVERSIFIED METALS

Rush Township, Schuylkill County, Pennsylvania

U.S. Environmental Protection Agency, Region III • Superfund Fact Sheet • February 1999

Fluff Pile Study Nears Completion

In June 1997, Lucent Technologies, Inc. (Lucent) signed an EPA legal document, thus agreeing to do a study of cleanup options for the Eastern Diversified Metals Site. This study, called a Focused Feasibility Study (FFS), examines the different ways to address the pile of wire-chopping wastes (fluff) in order to protect human and environmental health. The fluff pile amounts to approximately 250,000 cubic yards of waste, including polyvinyl chloride, polyethylene, metal, paper and soil.



In October 1997, EPA approved Lucent's work plan on how to gather the information needed for the FFS. Ten months later, in August 1998, Lucent's contractors submitted a draft of the study to EPA. EPA and the Pennsylvania Department of Environmental Protection (PADEP) reviewed the draft FFS and provided comments that Lucent will incorporate and address in the final FFS document. □

What Does the Study Contain?

The FFS provides a detailed evaluation of three options for addressing the fluff pile. All of the options involve "stabilization" — mixing in materials that convert the active inorganic matter into inert, harmless material. The options are:

1) On-site stabilization and off-site disposal — This involves adding materials to the pile in order to reduce the mobility of the contaminants. Next, the pile wastes would be taken off-site for disposal in an approved facility.

2) On-site separation and off-site recycling of copper; and on-site stabilization of the remaining fluff before disposing it off-site — This option involves sorting the fluff on-site and removing and recycling the copper products. Next, materials would be added to the remaining waste to restrict the movement of contaminants. Finally, the pile wastes would be taken off-site for disposal at an approved facility.

3) On-site separation and off-site recovery of polyethylene; on-site stabilization of the remaining pile and off-site disposal — This option involves sorting the fluff pile on-site to remove the plastic products for off-site recycling. The remaining materials would be stabilized on-site and taken off-site for disposal at an approved facility.

Based on extensive sampling of the fluff pile, it appears that the average polychlorinated biphenyl (PCB) content of the plastics is too high to allow for recycling the plastics into commercial products. Additionally, EPA and Lucent have been unable to find companies interested in burning the polyethylene for its heating value. As a result, option #3 does not appear to be viable.

Further study of the Resource Conservation and Recovery Act (RCRA) revealed a regulation that

continued on page 2...

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prohibits stabilization and off-site disposal of the fluff. RCRA is a law that governs the treatment, storage and disposal of hazardous wastes. RCRA regulations also define what substances are hazardous wastes. In order to dispose of the fluff at an off-site facility, the treatment process would have to reduce the concentration of PCBs in the fluff enough to meet the RCRA PCB requirement. Currently, stabilization will not reduce the PCBs to meet this requirement.

It may be possible to obtain a variance of this RCRA PCB requirement. However, recent changes in the RCRA regulations (as of May 26, 1998) also require more stringent standards for stabilizing lead (Pb). Because lead is also present in the fluff, the RCRA regulations increase the difficulty of treating the fluff.

Addendum to the FFS

In addition to the remedies in the FFS, Lucent submitted an Addendum to EPA in late August 1998. This Addendum evaluates on-site containment as a remedy. On-site containment, also known as in-place closure, involves capping or covering the waste pile and leaving the fluff at the site. EPA has agreed to review the Addendum even though in-place closure was not discussed in the scoping or development of the FFS. In-place closure has not been studied since the original Feasibility Study for the EDM Site was completed in 1991. EPA, PADEP and the U.S. Army Corps of Engineers (EPA's contractor), are currently reviewing the Addendum. ☐

What Happens Next?

Once the Addendum is reviewed and the FFS is approved, EPA will prepare a Proposed Remedial Action Plan (Proposed Plan). The Proposed Plan outlines EPA's preferred action to address the fluff pile.

After the Proposed Plan is released, EPA will place a copy in the local information repository, begin a 30-day public comment period and hold a public meeting in your community. EPA will also place a public notice in the *Times News* to announce the public meeting and comment period.

At the meeting, EPA will present the options available for addressing the fluff pile, outline EPA's recommended action, and solicit input from your community.

At the end of the public comment period, EPA will consider all comments received and select a remedy. EPA will announce this selection in a formal document called a Record of Decision. ☐

Additional Site Information is Available

EPA maintains a collection of site-related documents, called the Administrative Record File, at the Rush Township Municipal Building.

The Administrative Record File contains reports and other information about work at the EDM Site. You can review and photocopy the information contained in the file during normal business hours.

Rush Township Building
Route 54 West
Tamaqua, PA 18252
(717) 668-2938

You can also find information about the EDM Site, EPA Region III, Superfund and other EPA programs by visiting EPA on the World Wide Web. EPA's address is:

www.epa.gov/region3

If you would like to be added to EPA's mailing list to receive future fact sheets on the EDM Site, please contact one of the EPA officials on page 4. ☐

Updating Other Site Activities . . .

Dioxin Hotspot Removal

In September 1998, contractors started excavating several loads of dioxin contaminated waste from a "hot spot" at the site. This hot spot is also known as a former burn area of the fluff pile. Contaminated waste excavated from this area was loaded into trucks and hauled to Coffeyville, Kansas for incineration.

Prior to 1998, over 1,000 cubic yards of waste were removed from the site. To date, workers excavated an additional 600 cubic yards of waste for disposal. After the latest removal action, contractors collected samples to determine if EPA's cleanup goal was reached. Sampling results revealed that additional waste removal is needed to reach the dioxin cleanup standard.

Treatment Plant Upgrades

The Site Treatment Plant (STP) continues to operate; it treats leachate from the fluff pile and the shallow groundwater under the pile. In the spring of 1998, contractors enlarged the STP building, adding a 20,000-gallon equalization/storage tank and a 30,000-gallon biological treatment system.

The 20,000-gallon storage tank equalizes and slows the flow of water into and through the STP. This tank will help to capture leachate generated from heavy or long-lasting storms. It will also allow the plant to treat the water over a greater period of time.

Leachate from the fluff pile is piped directly into the new biological treatment system. This treatment system consists of an aeration tank, clarifier and sludge storage tank. The aeration tank adds oxygen to enhance the effectiveness of bacteria in the tank. Bacteria transforms the contamination into harmless by-products and a sludge-like material. The clarifier then separates the sludge from the clear water and sends it to a sludge storage tank. Finally, the treated leachate and the shallow groundwater pass through sand and ion exchange filters to remove zinc and other metals.

The improvements to the STP are operating effectively. Sampling results show that no discharge permit violations have occurred since the STP was upgraded. However, during the STP start-up phase in April 1998, the plant operator discovered the equalization tank was overflowing into the secondary containment tank. The operator immediately stopped the overflow. The equalization tank contained biologically-treated leachate that had not yet passed through the ion exchange filters. It was not clear if any leachate discharged from the secondary containment tank. Under a worst-case scenario, the greatest quantity that could have been discharged during this event would be 4,800 gallons of partially-treated leachate.

The plant operator is on-site an average of three days a week to monitor the STP. No other incidents have occurred since the STP was upgraded. In addition, alarms are now in place which automatically telephone the contractor well in advance of any potential release of untreated water. □

Repairs and Improvements

In the Fall of 1998 Lucent's contractors:

- Repaired the leachate collection system drain located around the base of the main fluff pile. Staining in an area of the drain indicated that some leachate was bypassing the collection system. Routine inspections of the drain will continue to ensure that it functions properly.
- Constructed two more leachate collectors. These improvements should ensure all leachate is collected, further improving surface water quality at the site. □

Site Contacts

EPA's Community Involvement Coordinator and Remedial Project Managers are available to answer any questions you may have about current or upcoming work at the EDM Site. You can contact Steve, Frank or Lisa at the addresses and phone numbers listed below. In July 1998, EPA moved the Region III offices to a new location. Please note the new address and phone numbers listed below.

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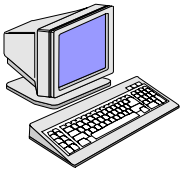

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EPA's New Address:
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Philadelphia, PA 19103-2029

INSIDE: Update on Work at the Eastern Diversified Metals Site

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